Beth S. Rose
Amy M. Handler
SILLS CUMMIS & GROSS P.C.
The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
(973) 643-7000
Attorneys for Defendant
Roxane Laboratories, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JAZZ PHARMACEUTICALS, INC. and JAZZ PHARMACEUTICALS IRELAND LIMITED, **Plaintiffs,** **v.** **ROXANE LABORATORIES, INC.,** **Defendant.**	**C.A. No. 2:15-cv-01360-ES-JAD** **NOTICE OF MOTION TO DISMISS COUNT II OF THE COMPLAINT**

PLEASE TAKE NOTICE that on May 18, 2015 at 10:00 a.m., or as soon thereafter as counsel may be heard, Defendant Roxanne Laboratories, Inc. ("Roxane") shall move before the Honorable Esther Salas, United States District Judge, at the Martin Luther King Building and U.S. Courthouse in Newark, New Jersey, pursuant to Federal Rules of Civil Procedure 12(b)(6), for an Order granting Roxane's Motion to Dismiss Count II of Plaintiffs Jazz Pharmaceuticals, Inc.'s and Jazz Pharmaceuticals Ireland Limited's Complaint.

PLEASE TAKE FURTHER NOTICE that Roxane shall rely upon the accompanying Memorandum of Law and upon all pleadings and proceedings on file herein.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service and Proposed form of Order Granting this Motion are attached.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully submitted this 20th day of April, 2015.

s/ Beth S. Rose
Beth S. Rose
Amy M. Handler
SILLS CUMMIS & GROSS P.C.
The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
(973) 643-7000

Attorneys for Defendant
Roxane Laboratories, Inc.

Of Counsel:
Alan B. Clement
Andrea L. Wayda
LOCKE LORD LLP
3 World Financial Center
New York, New York 10281
(212) 415-8600

Myoka Kim Goodin
David Abramowitz
Emily L. Savas
Locke Lord LLP
111 South Wacker Drive
Chicago, Illinois 60606
(312) 443-0700

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2015, I caused the foregoing NOTICE OF MOTION TO DISMISS COUNT II OF THE COMPLAINT, together with the memorandum of law in support thereof and a proposed form of order, to be electronically filed with the Clerk of the Court by using the Court's CM/ECF system, and accordingly served the parties who receive notice of the filing via the Court's CM/ECF system, as well as electronic mail.

s/Beth S. Rose
Beth S. Rose